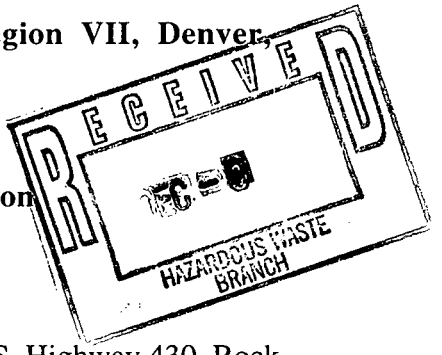
EPA NO. WY3325

FILE NO. P1-8

WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID & HAZARDOUS WASTE DIVISION
HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

FACILITY NAME	:	**SF Phosphates Limited Company**
EPA ID#	:	**WYD151663325**
LOCATION	:	**515 S. Highway 430, Rock Springs, WY**
MAILING ADDRESS	:	**P.O. Box 1789, Rock Springs, WY 82901**
FACILITY CONTACT	:	**Darin Howe, Environmental Manager**
TELEPHONE	:	**307-382-1519**
DATE OF INSPECTION	:	**August 7, 1996**
NOTIFICATION STATUS	:	**CESQG**
TYPE OF INSPECTION	:	**CEI, Used Oil**
PARTICIPANTS	:	**Deborah Myers, Senior Analyst, WDEQ/SHWD** **Nick Robinson, EPA Region VII, Denver, CO**
WEATHER	:	**70⁰; clear and sunny**

TIME IN: 9:45 am **TIME OUT: approx. 12:00 noon**



INTRODUCTION

Inspection of the SF Phosphates Limited Company located at 515 S. Highway 430, Rock Springs, WY was conducted to meet the requirements of the State/EPA Agreement. The purpose of the inspection was to conduct a compliance evaluation inspection to determine compliance with State regulations governing hazardous waste under Chapter 8, Hazardous Waste Generator Requirements and Chapter 12, Section 11, Standards for Generators of Used Oil, as applicable.

FINDINGS

SF Phosphates was formerly Chevron Chemical and manufactures phosphate fertilizers (P_2O_5) for Simplot and Farmland exclusively. The manufacturing process is as follows:

Molten sulfur → storage tank → burner (produces SO_2 gas) → converter in the presence of vanadium via a V_20_5 catalyst which produces SO_3 → combine SO_3 and H_2O to produce H_2SO_4 → $H_2SO_4 + CaPO_4 \rightarrow H_3PO_4 + CaSO_4$

The plant then uses the phosphate in H_3PO_4 to make fertilizer. $CaSO_4$ is gypsum and nonhazardous. Spent vanadium pentoxide (i.e. sulfuric catalyst) is generated in the converter.

The spent catalyst is sent to a reclaimer in Arkansas provided it does not contain metal scale and/or quartz rock; if it does it is disposed at a permitted hazardous waste facility.

A review of the June 25, 1993 manifests verified that SF Phosphates shipped the following wastes to Rollins, OPC in Los Angeles, CA for disposal. These wastes were generated during the clean up of a laboratory and disposal of old laboratory supplies. No shipments of hazardous wastes have occurred since June, 1993.

metallic mercury (broken thermometers)	-	D009	-	one (1) pound
magnesium perchlorate	-	D001	-	two (2) pounds
lead tetraacetate	-	D008	-	one (1) pound
chloroform	-	U044	-	two (2) pounds
barium hydroxide	-	D006	-	five (5) pounds

The facility has three (3) satellite accumulation areas as follows:

1) Main maintenance shop - aerosol can puncturing station

Used aerosol cans contain paint and cleaner residue. Fluid from the aerosol can puncturing container will be sampled and analyzed when the drum becomes full. The puncturing unit is open to the atmosphere and the inspectors recommended purchasing a new unit. SF Phosphates advised the inspectors that a new unit had already been ordered. On August 12, 1996, the department received correspondence from Darin Howe, Environmental Affairs Manager for SF Phosphates along with a photograph of the new puncturing unit which was installed on August 9, 1996 at 2:50 p.m. A copy of Mr. Howe's letter and the photograph is attached to this report.

2) Rubber coating area - rags and brushes

Rags and brushes contaminated with rubber and associated glues and cements are generated during the installation of liners in process pipes and duct work.

3) Ni-Cd battery storage - Ni-Cd batteries

Ni-Cd batteries are used in process controllers. Ni-Cd batteries will be recycled if possible or disposed.

Currently, all hazardous wastes generated at SF Phosphates are transported to USPCI for disposal.

The plant maintains two (2) parts washers, one in the main shop and the other in the mobile equipment shop. Both parts washers utilize mineral spirits with a flash point greater than 140 degrees F. SF Phosphates switched from Safety Kleen to the 140 mineral spirits in 1993. This switch allowed the plant to virtually eliminate the generation of hazardous waste.

SF Phosphates also generates used oil during equipment repair and maintenance. Used oil is stored in a 1,250 gallon used oil storage tank (see photo #2). Secondary containment is sized to

hold the entire tank volume. The funnel on the top of the tank is equipped with a sliding gate so that the tank is closed to the atmosphere. A second used oil storage tank is located in the vehicle maintenance shop (see photo #3) which is also closed to the atmosphere. Used oil is picked up and recycled by H & M Oil Corporation. A review of the used oil records revealed that between May 16, 1996, and May 2, 1995, H & M Oil had picked up 7,070 gallons of used oil from the site. The maintenance shops also generate used antifreeze; the inspectors recommended that it be recycled.

A review of the plant's Emergency Response Guidelines and Procedures revealed them to be in order.

Bob Todino and Ray Hardy, mobile equipment mechanics attended WDEQ/SHWD's Pollution Prevention/Waste Minimization Seminar in Casper during the summer of 1995. Darin Howe attended the same seminar in Rock Springs in the Spring of 1995.

CONCLUSIONS

The inspection revealed that SF Phosphates is a conditionally exempt small quantity generator of hazardous waste. Given that the facility had ordered a new can puncturing unit prior to the inspection, the inspectors did not take issue with the puncturing unit in place at the time of the inspection. No other violations were found.

END INSPECTION REPORT

Enc: SF Phosphate correspondence dated August 9, 1996, with accompanying photograph (dated August 9, 1996) of the aerosol can puncturing station.
WDEQ/SHWD Chapter 12 inspection check list
WDEQ/SHWD Inspection Photograph Report

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WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY

SOLID AND HAZARDOUS WASTE DIVISION

CHAPTER 12, STANDARDS FOR GENERATORS OF USED OIL CHECKLIST

Used Oil Handler Name SF Phosphates Limited, Company

Street or Mailing Address P.O. BOX 1789

City Rock Springs State WY Zip Code 82902

Facility Contact/Telephone No. DARIN HOWE 307-382-1579

Type of Ownership

___1. Fed. ___2. State ___3. County ___ 4. Munic. X 5. Private

Function

X 1. Gen. ___ 2. Trans. ___ 3. Treat. ___ 4. Storage ___ 5. Disp.

Inspector Information:

Principal Inspector Name DEB MYERS Title Senior Analyst

Organization WDEQ Telephone # 307-777-7246

Used Oil Generator Standards	Yes	No
1. Does the generator transport used oil? If so, does the generator comply with the following requirements: [Sec.11(a)(ii)(A)]	___	✓
a. Is the oil transported in a vehicle owned by the generator or by an employee of the generator?	___	___
b. Does the generator transport no more than 55 gallons of used oil at any time?	___	___
c. Does the generator transport the used oil to a used oil collection center that is registered licensed, permitted, or recognized by state/ county/municipal gov't to manage used oil or to a used oil aggregation point owned by the generator?	___	___
d. If so, does the generator transport the used oil to an aggregation point and complies with a-c?	___	___

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HAZARDOUS WASTE BRANCH

		Yes	No
NOTE:	**If the generator answers NO to any of the questions 1a-d, the generator must address the requirements of Chapter 12, Section 13 Standards For Used Oil Transporters.**		
2.	Does the generator process or re-refine used oil? [Sec.11(a)(ii)(B)]	_____	✓

Generators who perform the following activities **are not processors** provided that the used oil is **generated on-site** and **is not being sent off-site to a burner of on- or off-specification used oil fuel.**

a. Filtering, cleaning or otherwise reconditioning used oil before returning it for reuse by the generator;

b. Separating used oil from wastewater generated onsite to make the wastewater acceptable for discharge;

c. Using oil mist collectors to remove small droplets of used oil from in-plant air;

d. Draining or otherwise removing used oil from material containing or otherwise contaminated with used oil to remove excessive oil according to the requirement;

e. Filtering, separating or otherwise reconditioning used oil before burning it in a space heater.

3.	Does the generator burn off-spec used oil fuel for energy recovery? [Sec.11(a)(ii)(C)]	_____	✓
	If so, does the generator burn used oil in a space heater that meets the following requirements:		
	a. The burner burns only used oil generated by the owner/operator or from household do-it-yourselfers (DIYs)?	_____	_____
	b. The heater has a maximum capacity of not more than 0.5 million Btu/hr?	_____	_____
	c. The combustion gases from the heater are vented to the outside?	_____	_____

NOTE: **If the generator does not comply with any of the**

space heater burner requirements, the generator must address the requirements of Chapter 12, Section 15, Standards for Used Oil Burners Who Burn Off- Spec Used Oil Fuel for Energy Recovery.

		Yes	No
4.	Does the generator ship off-spec used oil to a used oil burner or claim that the used oil is to be burned for energy recovery and it meets the used oil fuel spec?		✓
	If so, has the generator complied with the Chapter 12, Section 16, Used Oil Fuel Marketer requirements (p.12-89)? [Sec.11(a)(ii)(D)]		
	Is there evidence the used oil is transported only by transporters that have EPA ID#s?[Sec.11(e)]	✓	
5.	Does the generator dispose of used oil and/or use it as a dust suppressant?[Section 17]		✓
6.	Does the generator have used oil containing greater than 1,000 ppm total halogens?[Sec.11(b)(ii)]		✓
	If so, has the generator successfully rebutted the rebuttable presumption? If so, is there documentation to verify? [Sec.11(b)(I)]		
	If the generator can not successfully rebut the rebuttable presumption, is the used oil and hazardous waste mixture being managed according to the used oil and hazardous waste mixture requirements of Section 10(a)(ii)(p.12-47)[Sec.11(b)]		
7.	Does the generator have an SPCC plan that adequately addresses used oil spills and cleanup?[Sec.11(c)]		
	Note: This item is only applicable if the generator generates more than 660 gallons of used oil.	✓	
	Does the generator store used oil in USTs?		✓
	If so, is the tank in compliance with the UST requirements?[Sec.11(c)]		
	Does the used oil stored in the UST exhibit a characteristic of hazardous waste?		

		Yes	No
	If so, is the generator in compliance with the Chapter 12, Section 11 requirements? [Sec.11(c)]		
8.	Does the generator store used oil in tanks, containers, or units that meet the hazardous waste container requirements?[Sec.11(c)(i)]	✓	
	If so, are the containers in good condition (no severe rusting, structural defects or deterioration) and there are no visible leaks?[Sec.11(c)(ii)]	✓	
9.	Are the containers, above ground tanks, and UST fill pipes labeled or clearly marked with the words, "Used Oil"?[Sec.11(c)(iii)]	✓	
10.	Is there evidence the generator performs the following cleanup steps in response to used oil releases:		
	a. Stopped the release	N/A	
	b. Contained the released used oil		
	c. Clean up and properly manage the released used oil and other materials		
	d. If necessary, does the generator take the following measures to repair/replace any leaking used oil containers/tanks before returning to service[Sec.11(c)(iv)]		
10.	Does the generator have a 'tolling arrangement' whereby the reclaimed used oil is returned by the processor/re-refiner to the generator for reuse?		✓
	If so, does the 'tolling arrangement'contract contain the following info:[Sec.11(c)(iii)]		
	a. Used oil type and frequency of shipments		
	b. Vehicle for transporting used oil is owned by the generator		
	c. The reclaimed oil will be returned to the generator		

Used Oil Collection Center/Aggregation Pt. Requirements

1.	Does the generator own/operate a do-it-yourselfer(DIY) used oil collection center?		✓
	If so, does the generator comply with all of the generator requirements?[Sec.12(a)]		
2.	Does the generator own/operate a used oil collection center?[Sec.12(b)]		✓

If so, does the generator comply with all generator requirements and is recognized by a state/county/ municipal gov't. to manage used oil? ____ ____

3. Does the generator own a used oil aggregation point? ✓ ____ AGGREGATION POINT IS CENTRALLY LOCATED ON SITE FOR SITE GENERATED OIL
[Sec.12(c)]
If so, does the generator comply with the following requirements:

	Yes	No
a. The generator accepts used oil only from locations owned and operated by the owner/operator of the aggregation point?	____	____
b. The generator accepts used oil that is transported only in quantities less than 55 gallons and only in company or employee owned vehicles? [Sec.12(c)]	____	✓

Used Oil Filters

1. Does the owner/operator generates used oil filters?	✓	____
If so, is there evidence the filters are non-terne? [Chapter 2, Section 1(d)(ii)(M)]	✓	____
Is there evidence the filters are hot-drained using one of the following methods?[Section 1(d)(ii)(M)]		
a) Puncturing the filter anti-drain back valve or the filter dome end?	✓	____
b) Crushing?	____	____
c) Dismantling?	____	____
d) Any other equivalent hot-draining method that will remove used oil?	✓	____

Summary of Violations: _____

SF Phosphates Limited Company
A Utah Limited Liability Company
P. O. Box 1789 • 515 South Hwy. 430
Rock Springs, WY 82902-1789
(307) 382-1400

August 9, 1996

8/7/96 RCRA INSPECTION

Ms. Deborah Myers, Senior Environmental Analyst
Wyoming Department of Environmental Quality
Solid and Hazardous Waste Division
122 West 25th Street
Herschler Building, 4W
Cheyenne, WY 82002

Dear Deborah:

As we discussed during the inspection this past Wednesday, I had ordered a new "Aerosolv" can puncturing unit prior to the inspection due to problems that had recently been encountered with the old unit. The new unit was received and installed today. I have enclosed a photograph of the new unit.

I look forward to reviewing your report. In the meantime, feel free to contact me with any questions or comments.

I view these inspections as a valuable learning tool and would appreciate any suggestions for improvement that you may have. I would welcome your and/or Mr. Robinson's return to this facility at any time.

Sincerely,

Darin L Howe

Darin L. Howe
Environmental Affairs Manager

DLH/mbt

cc: Mr. Nicholas Robinson - USEPA, Region VIII (Denver)
Archive
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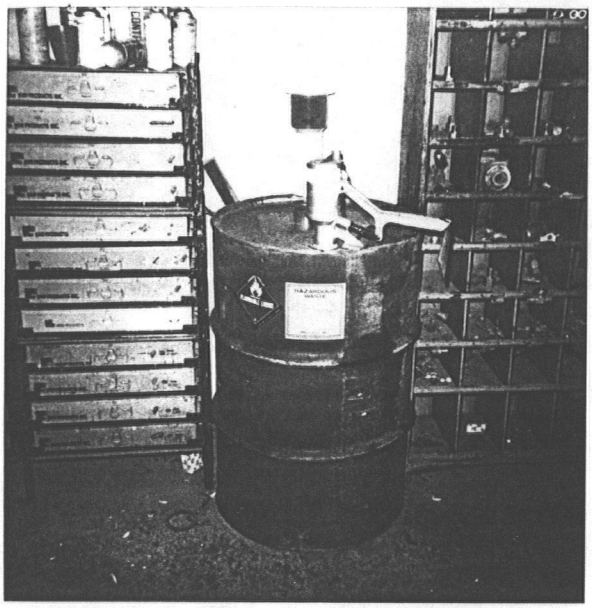

8-9-96 2:50 p.m.

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WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID & HAZARDOUS WASTE DIVISION

PHOTOGRAPHIC REPORT - PHOTO KEY

SITE NAME	:	SF Phosphates 525 S. Highway 430 P.O. Box 1789 Rock Springs, WY 82901
DATE/TIME	:	8/7/96 9:45 am
INSPECTOR	:	Deborah Myers, WDEQ/SHWD; Nick Robinson, EPA Region VIII
PHOTOGRAPHER	:	Deborah Myers
WITNESSES	:	Nick Robinson; Darin Howe, SF Phosphates, Manager, Env. Affairs
ROLL NUMBER(S)	:	443441

PHOTO #/BEARING/DESCRIPTION

Photo #1	:	Satellite Accumulation Area in Main Maintenance Shop - aerosol can puncturing station. Puncturing unit is open to the atmosphere. New unit was installed on 8/9/96 (see SF Phosphates correspondence and attached photograph dated 8/9/96).
Photo #2	:	Used oil storage area. Funnel on top of container has a sliding gate so that container is closed to the atmosphere.
Photo #3	:	Used oil storage tank (250 gallons) at the vehicle maintenance shop.
Photo #4	:	Used brush/rag collection container in the Rubber Shop.
Photo #5	:	Ni-Cd battery storage. The black barrels are empty; only storage is occurring in the white 5-gallon bucket.

END PHOTOGRAPHIC REPORT

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Wyoming Department of Environmental Quality
Solid and Hazardous Waste Division

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Deborah Myers

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Photo # 2

Frame # 9

Roll # 443441

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Wyoming Department of Environmental Quality
Solid and Hazardous Waste Division

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Deborah Myers

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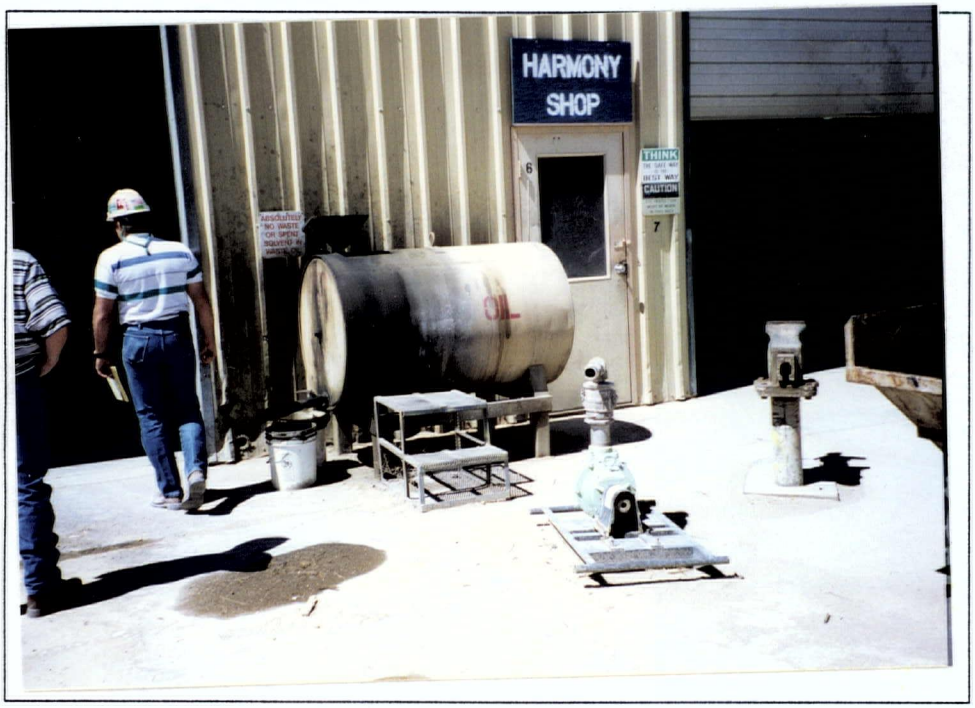

Photo # 3

Frame # 8

Roll # 443441

Photo # 4

Frame # 7

Roll # 443441

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Wyoming Department of Environmental Quality
Solid and Hazardous Waste Division

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Roll # 443441

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Frame #

Roll #